UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

CERTAIN UNDERWRITING MEMBERS AT LLOYD'S OF LONDON,

INSURANCE COMPANY

OF THE AMERICAS,

 \mathbf{v}_{\bullet}

NO: 1: 16-cv-00323

Petitioners,

DECLARATION OF TIMOTHY W.

: STALKER IN SUPPORT OF CERTAIN

: UNDERWRITING MEMBERS AT

: LLOYDS OF LONDON MOTION TO

: VACATE ARBRITRATION AWARD

Respondent.

DECLARATION OF TIMOTHY W. STALKER

TIMOTHY W. STALKER, declares pursuant to 28 U.S.C. §1746:

- I am partner at the law firm Weber Gallagher Simpson Stapleton Fires & Newby, LLC in Philadelphia, Pennsylvania, counsel to Petitioner Certain Underwriting Members at Lloyd's of London.
- 2. I submit this Declaration in support of Petitioners Certain Underwriting Members at Lloyds of London's Motion to Vacate Arbitration Award.
- Attached hereto as Exhibit1 is a true and correct copy of the FINAL AWARD, October 19, 2015, Signed by Members of the Arbitration Panel, Alex Campos, Trevor Clegg (Dissenting), Ben F. Hernandez.
- 4. Attached hereto as Exhibit 2 is a true and correct copy of the UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA (Atlanta) CIVIL DOCKET

- FOR CASE #: 1: 12-mi-00178-WSD-GGB in the matter Reorganized Human Dynamics Corporation v. Human Dynamics Captive Management et al.
- 5. Attached hereto as Exhibit 3 is a true and correct copy of the CEASE AND DESIST ORDER ("CONSENT ORDER") issued against Alex J. Campos and One World Mortgage Corporation on May 28, 2009 by the Georgia Department of Banking and Finance. Docket Number: OSAH-DBF-MBL-0918481-67-Gatto.
- 6. Attached hereto as Exhibit 4 is a true and correct copy of the SETTLEMENT AND RELEASE AGREEMENT executed February 22, 2012 by Alex Campos, individually, and on behalf of One World with the Federal Deposit Insurance Corporation ("FDIC").
- 7. Attached hereto as Exhibit 5 is a true and correct copy of the Amended Complaint filed in the Supreme Court of State of New York, Oneida, County, IPA ACQUISITIONS,INC. vs. INSURANCE COMPANY OF THE AMERICAS, FREDERICK GLENN CARROLL, ROBERTY GERALD MORLEY ANDERSON, GARY THORNLEY HIRST., Index No. CA2010-003201 Dated: March 19, 2012.
- 8. Attached hereto as Exhibit 6 is a true and correct copy of the Clash Catastrophe Treaty 0274/04 entered into by Underwriters and ICA and/or Oriska Insurance Company ("Oriska") and/or Reinsurance Company of America, Inc. ("RCA"). Effective Date December 31, 2004.
- 9. Attached hereto as Exhibit 7 is a true and correct copy of the an article obtained from UTICAOD.com, written by Rocco LaDuca, March 24, 2009, indicating Oriksa President Kernan's wife plead guilty to employing a felon.

- 10. Attached hereto as Exhibit 8 is a true and correct copy of the demand letter for arbitration and appointment of Alex Campos as Arbitrator for ICA, dated December 23, 2014, from the law offices of Johnson, Gallagher & Magliery, LLC ("Johnson Magliery").
- 11. Attached hereto as Exhibit 9 is a true and correct copy of the American Arbitration Association Code, the Code of Ethics for Arbitrators in Commercial Disputes, effective March 1, 2004.
- 12. Attached hereto as Exhibit 10 is a true and correct copy of the ARIAS-US Code of Conduct, Cannon IV, Disclosure requirements for arbitrators.
- 13. Attached hereto as Exhibit 11 is a true and correct copy of the ICA documents filed with the Florida Department of State Division of Corporations obtained from URLs http://search.sunbiz.org//inquiry/CorporationSearch/Search and http://www.corporationwiki.com/California/Danville/cencal-commercial-services-inc/41644113.aspx.
- 14. Attached hereto as Exhibit 12 is a true and correct copy of an online article written by Steve Stradbrooke for the National Credit Union Admiration on July 21, 2011 titled "Vensure Credit Union Liquidated, Stolenbanksrolls.com tracks AWOL Deposits" obtained at URL http://calvinayre.com/2011/07/21/busines/vensure-credit-union-liquidated-stolenbankrolls-com-launched/
- 15. Attached hereto as Exhibit 13 is a true and correct copy of a Company Profile listing for First Florida Equity Holdings which lists Gary Hirst, John Iorillo, and Robert Morley obtained from URL http://corporationwiki.com/Florida/Lake-Mary/first-florida-equity-holdings-inc/26223.

- 16. Attached hereto as Exhibit 14 is a true and correct copy of corporate documents filed with the State of Florida by Ricardo Rios listing ICA's principal place of business as:
 4140 E. Baseline Road, Suite 201, Mesa, Arizona 85206.
- 17. Attached hereto as Exhibit 15 is a true and correct copy of "Iorillo Insights", Volume 13, Issue 1, Dated December 15, 2010 obtained from the internet and produced by John Iorillo.
- 18. Attached hereto as Exhibit 16 is a true and correct copy Vensure Employer Services

 Internal Directory Employee listing obtained from the Vensure Employer Services
 website and available online.
- 19. Attached hereto as Exhibit 17 is a true and correct copy of Vensure Employer Services intranet list indicating Ricardo Rios is the Chief Financial Officer, Robert Morley is an Executive and Outside Counsel, and John Iorillo in the MGA.
- 20. Attached hereto as Exhibit 18 is a true and correct copy of internet searches obtained from public websites linking Campos to ICA, Iorillo, Rios, Benton Morley and the Players.
- 21. Attached hereto as Exhibit 19 is a true and correct copy of the Organization Meeting Transcript between Insurance Companies of the Americas and Certain Underwriters which occurred on May 11, 2015.
- 22. Attached hereto as Exhibit 20 is a true and correct copy of the potential witness list submitted by Insurance Companies of the Americas on September 11, 2015 by Attorney John Magliery of Johnson, Gallagher, Magliery, LLC.
- 23. Attached hereto as Exhibit 21 is a true and correct copy of an Affidavit of Benton Morley in Opposition to Plaintiff's Motion for Partial Summary Judgment in the Matter of Patriot

- National Insurance Group, Inc., Guarantee Insurance Company and Ullico Casualty Company v. Vensure Employer Services, Inc., United States Of District Court Southern District Of Florida, CASE NO.: 12-cv-61312-KAM.
- 24. Attached hereto as Exhibit 22 is a true and correct copy of an Order entered September 5, 2012 by Justice David G. Campbell of the United States District Court for the District of Arizona in Case No.: cv 12-0509-PHX-DGC.
- 25. Attached hereto as Exhibit 23 is a true and correct copy of the Trial Testimony of Alex Campos in the Human Dynamics Corporation matter in the District Court of Arizona, case 2:11-cv-02510-DGC.
- 26. Attached hereto as Exhibit 24 is a true and correct copy of discovery requests propounded by Certain Underwriting Members of Lloyd's London, dated July 15, 2015 by Attorney for Petitioners.
- 27. Attached hereto as Exhibit 25 is a true and correct copy of Transcript Testimony from Day 1 of the Arbitration between Insurance Companies of America and Certain Underwriting Members of Lloyds of London, which included by reference a letter from James M. Kernan to John M. Magliery.
- 28. Attached hereto as Exhibit 26 is a true and correct copy of the Transcript of Testimony from Day 1 of the Arbitration between Insurance Companies of America and Certain Underwriting Members of Lloyds of London.
- 29. Attached hereto as Exhibit 27 is a true and correct copy of the Transcript of Testimony from Day 1 of the Arbitration between Insurance Companies of America and Certain Underwriting Members of Lloyds of London.

30. Attached hereto as Exhibit 28 is a true and correct copy of the Transcript of Testimony from Day 1 of the Arbitration between Insurance Companies of America and Certain Underwriting Members of Lloyds of London.

31. I declaré under penalty of perjury that the above is true and correct.

Bv:

Timothy W. Stalker, Esquire

Dated: January 15, 2016